REMARKS

This is intended as a full and complete response to the Office Action dated November 14, 2007, having a shortened statutory period for response set to expire on February 14, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Claims Rejections - 35 U.S.C. § 102

Claim 58 stands rejected under 35 U.S.C. § 102 as being anticipated by *Simpson* (WO0037766). In response, Applicants have canceled claim 58 without prejudice. Accordingly, Applicants request withdrawal of the rejection.

Claim Rejections - 35 U.S.C. § 103

Claims 1-19, 23-29, 54, 55 and 57 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Simpson* in view of *Peterson* (US 5,275,240). In response, Applicants respectfully traverse the rejection.

Claim 1 recites a method that includes "selecting a level of the radial force to increase the collapse resistance of the tubular independent of any constraining effects on the tubular." As the Examiner states, *Simpson* does not disclose this limitation. Further, the Examiner misconstrues the teachings of *Peterson*. Adding grooves to an interior surface of a tubular as disclosed in *Peterson* does not increase collapse resistance of the tubular as the Examiner contends. To the contrary and as shown in Figure 4 of *Peterson*, the entire point of the grooves is to in presence of axial load facilitate collapse albeit without unacceptable radial deformation. In fact, *Peterson* teaches that a protective sleeve may be placed around the tubular where the grooves

are located "to prevent lateral buckling," which is inherently not even an issue at areas of the tubular without the grooves. As further evidence that the grooves do not increase collapse resistance, increase in space between the grooves or increase of a wall thickness to reduce depth of the groove can as described at column 4, lines 3-6, of *Peterson* increase collapse strength. In conclusion, the grooves taught in *Peterson* encourage collapse rather than resist collapse.

Therefore, *Simpson* in view of *Peterson* fails to teach, show or suggest each and every element of claim 1 since *Peterson* when properly construed does not overcome the missing element of "selecting a level of the radial force to increase the collapse resistance of the tubular independent of any constraining effects on the tubular," as recited in claim 1. Further, one skilled in the art would lack any reasoning for combining *Simpson* and *Peterson* based on the foregoing. Accordingly, Applicants submit that *Simpson* in view of *Peterson* cannot render claim 1 or any claim dependent thereon obvious and request withdrawal of the rejection and allowance of claims 1-19, 23-29 and 57.

Claim 54 recites a method that includes "selecting a level of the radial force to increase the collapse resistance of the tubular, wherein the tubular experiences no diametric expansion as a result of the radial force applied by the bearing member." As the Examiner states, *Simpson* does not disclose this limitation. With reference to the discussion regarding claim 1, adding the grooves to the tubular as disclosed in *Peterson* does not increase collapse resistance of the tubular.

Therefore, *Simpson* in view of *Peterson* fails to teach, show or suggest each and every element of claim 54 since *Peterson* when properly construed does not overcome the missing element of "selecting a level of the radial force to increase the collapse resistance of the tubular, wherein the tubular experiences no diametric expansion as a result of the radial force applied by the bearing member," as recited in claim 54. Further, one skilled in the art would lack any reasoning for combining *Simpson* and *Peterson* based on the foregoing. Accordingly, Applicants submit that *Simpson* in view of *Peterson* cannot render claim 54 or claim 55 dependent thereon obvious and request withdrawal of the rejection and allowance of these claims.

Claim 20 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Simpson* and *Peterson* in view of *Hempel* (US 2,898,971). Claims 21 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Simpson* and *Peterson* in view of *Harrall* (SPE 2002). In response, Applicants submit that *Hempel* or *Harrall* fail to overcome the deficiencies of *Simpson* and *Peterson* as described above with respect to claim 1 from which claims 20-22 depend. Accordingly, Applicants submit that *Simpson* and *Peterson* in view of either *Hempel* or *Harrall* cannot render obvious claims 20-22 and request withdrawal of the rejection and allowance of the claims.

Claims 56 and 59 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Simpson* in view of *Harrall*. In response, Applicants respectfully traverse the rejection of claim 56 and have canceled claim 59 without prejudice.

Claim 56 includes the limitation of "expanding the tubular with a cone expander" and then "placing the bearing member in direct engagement with a wall of the tubular." As the Examiner states, "*Simpson* does not disclose expanding the tubular with a cone expander before locating the tool in the tubular." Hypothetically, applications in *Harrall* teach that rotary expansion tools may be used with expandable tubulars (*e.g.*, new patches/clads as taught in *Harrall* at page 4 cited by the Examiner) in previously formed wells that may have existing tubing (*e.g.*, worn casing) expanded with cone swages. This teaching of *Harrall* alone fails to provide any indication of, or reasoning for, swage expansion of the same tubular that is in direct engagement with a rotary expansion tool.

Therefore, *Harrall* cannot remedy the deficiency of *Simpson* since *Harrall* also fails to teach, show or suggest "expanding the tubular with a cone expander" and then "placing the bearing member in direct engagement with a wall of the tubular," as recited in claim 56. Further, *Simpson* in view of *Harrall* fails to render claim 56 obvious. Accordingly, Applicants respectfully request withdrawal of the rejection and allowance of claim 56.

Conclusion

Having addressed all issues set out in the Office Action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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